



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL:

July 17, 2023

[Safouh.Sayed@dtsc.ca.gov](mailto:Safouh.Sayed@dtsc.ca.gov)

Safouh Sayed, Project Manager  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, CA 90630

## **Draft Removal Action Workplan (DRAW) for the Otay Ranch Village 3-Lots 826, 827, and Parcel 2 Chula Vista Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the Community Update Public Notice, the Draft Removal Action Workplan (DRAW) is a cleanup plan prepared by the Department of Toxic Substances Control (DTSC) to remediate the soil contamination caused by Methane and Volatile Organic Compounds (VOCs) on a 9.73-acre area in Otay Ranch Village, consisting of three parcels (Lots 826 and 827, as well as Parcel 2) located on Heritage Road in Chula Vista in San Diego County. The purpose of this plan is to evaluate and propose three distinct remedial alternatives for the site cleanup. These alternatives include: 1) No Action; 2) Installation of sub-slab ventilation (SSV) with a vapor barrier for new construction. 3) Installation of Sub-Slab Depressurization (SSD) with a Vapor Barrier.

Although the project site is not located in South Coast AQMD's jurisdiction area, due to the presence of VOCs in soil, the cleanup activity such as excavation or soil movement and off-site disposal of contaminated soil may generate fugitive dust during the hauling trips to the South Coast AQMD region, the requirements of South Coast AQMD Rule 403 – Fugitive Dust<sup>1</sup> may apply and should be discussed in the cleanup plan.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang  
Program Supervisor, CEQA IGR  
Planning, Rule Development & Implementation

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<sup>1</sup> South Coast AQMD Rule 403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

SW:SG  
ODP230621-09  
Control Number